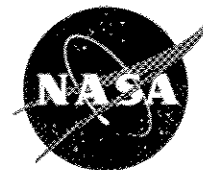


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



October 8, 2009

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at Events Related to the 60th
International Astronautical Congress, October 11-15, 2009

Representatives from NASA have been invited to attend a series of events in conjunction with the 60th International Astronautical Congress at the Daejeon Conference Center in Daejeon, Korea. The IAC is intended to enable representatives from the space industry, space users, space policy makers, students, young professionals, researchers and academicians to meet and exchange experiences and knowledge on space-related topics, and to develop worldwide cooperation programs. The IAC is the largest annual event by the International Astronautical Federation (IAF), a non-governmental, non-profit, membership organization, based in Paris, France. The Congress is hosted by one of the IAF's member countries, which forms a local organizing committee. The events are as follows:

1. IAF Dinner, October 11, 2009: The IAF plans to host a dinner at 7 p.m. at the Spapia Hotel. Approximately 50-60 people are expected to attend, including representatives from IAF, the government heads of the space agencies, and a number of parliamentarians from Korea and other countries. The maximum benefit per employee is approximately \$58.
2. IAF Luncheon, October 12, 2009: The IAF will host a luncheon at 12:45 p.m. at Soyuz Restaurant in the Convention Center. Approximately 75-100 people are expected to attend, including representatives from IAF, the government heads of the space agencies, a number of parliamentarians from Korea and other countries, and Korean national and local government officials. The cost is approximately \$36 per person.
3. Arianespace Cocktail Reception, October 12, 2009: Approximately 100 people have been invited to a reception at the Hanbit Tower in the Daejeon Expo Science Park at 7:00 p.m. The event is sponsored by Arianespace. The cost per person is approximately \$50 per person. Attendees will include representatives from industry, IAF leaders, the heads of space agencies, embassy attachés, and Korean officials.
4. IAC Welcome Reception, October 12, 2009: Following the Arianespace cocktail reception, the IAF and Arianespace are co-sponsoring a large reception for all IAC attendees, approximately 3,000 people. The reception will be held at the Hanbit Tower in the Daejeon

Expo Science Park at 8 p.m. at a cost of \$50 per person. Invited attendees would include representatives from governments, the space industry, space users, space policy makers, students, young professionals, researchers and academicians.

5. Spacefarer Social, October 13, 2009: Lockheed Martin will sponsor a reception from 6:00 p.m. to 8:00 p.m. at Soyuz Hall in the Convention Center. The event will have a number of speakers, including astronauts, cosmonauts, and taikonauts. It is open to all attendees under a certain age. Approximately 150 - 200 people are expected to attend, including the younger representatives from governments, the space industry, academia, students, and foreign nationals. The cost is approximately \$25-\$33 per person.

6. Experience Mixer, October 14, 2009: Lockheed Martin, Boeing, and Aerospace Corporation will sponsor a reception from 6:00 p.m. to 8:00 p.m. at the Daejeon Convention Center. Many international space experts will have outreach tables set up and the attendees will be able to interact with these experts. The event is open to all attendees under a certain age. Approximately 150 - 200 people are expected to attend, including the younger representatives from governments, the space industry, academia, students, and foreign nationals. The cost is approximately \$25-\$33 per person.

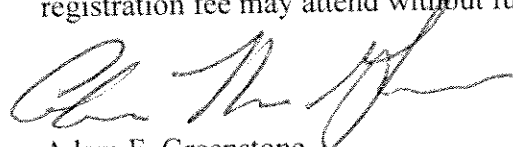
7. Next Generation Party, October 15, 2009: The IAC Daejeon Local Coordinating Committee is hosting an event at Hanbit Square at the Daejeon Expo Science Park. The event is sponsored by the Korean Aerospace Research Institute (KARI) and Gyerong Construction. Approximately 500 people are expected to attend at a cost of about \$25 per person. Attendees will include representatives from governments, the space industry, academia, students, and foreign nationals.

I find that these events meet the requirements of a widely attended gathering as defined in 5 C.F.R. § 2635.204(g). Because of NASA's interest in international collaboration and in the advancement and application of spaceflight and related technologies, I find that there is an Agency interest in having NASA personnel attend. NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance at these events for themselves and their spouses or guests.

NASA employees, whose duties may substantially affect these co-sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their ethics counselor.

Moreover, NASA employees who are in non-career positions in which the President's Executive Order of January 21, 2009, requires signing an ethics pledge may accept free attendance at the IAF Dinner, the IAF luncheon, and the Next Generation Party, but may only attend the other events if they reimburse the sponsors for each reception the cost of the food

and refreshments they consume. Note that attendance at the IAC Welcome Reception is included in the registration fee, so employees for whom the Government has paid the registration fee may attend without further payment.



Adam F. Greenstone